



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

C-14J

August 30, 2004

EPA Region 5 Records Ctr.



262728

MEMORANDUM

SUBJECT: Citizen Suit Under CERCLA
FROM: *for* *Deloris Johnson*
Jacqueline Miller
Associate Regional Counsel
TO: Richard C. Karl, Acting Director
Superfund Division

The Office of Regional Counsel has received the attached notice for a citizen suit. Please review the notice to determine whether U.S. EPA is taking or intends to take enforcement action at the referenced facility or site and convey your determination to me via memorandum (C-14J) or telephone (886-7167), or to Deloris Johnson, telephone (886-6806). Enforcement action initiated by U.S. EPA at the facility or site prior to sixty days after receipt of the attached notice may preclude the citizen suit.

cc: Bertram Frey
Eric Cohen

(621)

KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET - SUITE 810

CHICAGO, ILLINOIS 60610

JOSEPH V. KARAGANIS

A. BRUCE WHITE

BARBARA ANNE MAGEL

MARK D. ERZEN

JOHN W. KALICH

CHRISTOPHER W. NEWCOMB

TELEPHONE

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(312) 836-9083

Direct Dial: 312/836-1177, ext. 124

email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Registered Agent for Ace Hardware

Registered Office: 701 Brazos Street, Suite 1050

Austin, TX 78701

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir or Madam:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

Comprehensive Environmental Response, Compensation, and Liability Act

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Robert C. Hildebrandt
Registered Agent for Ames Supply Company
1936 University Lane Unit C
Lisle, IL 60532

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

James E. Pielsticker
Registered Agent for Arrow Gear Co.
2301 Curtiss St
Downers Grove, IL 60515-4055

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Dorothy Sjogren
Registered Agent for Artec Industries, Inc.
20338 Brentwood
Livonia, MI 48152

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Madam:

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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William G. Wolfe

Registered Agent for Atlas Tubing Co. (a/k/a Da-Kay Enterprises)

4525 Gollihar Street

Suite 114

Corpus Christi, TX 78411-2931

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Gene McCullough
Registered Agent for Bales Mold Service
323 E. Jackson
Harlingen, TX 78550

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Guy E. Snyder
Registered Agent for Bison Gear & Eng Corp.
222 N LaSalle Street 2400
Chicago, IL 60601

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Scott Brennan
Registered Agent for Brennan Eng. Corp.
1421 SW 17TH Street
Boca Raton, FL 33486

**RE: Soil/Groundwater Contamination Downers Grove Illinois
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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Michael E. Irwin
Registered Agent for Bridges Electric, Inc.
407 W. Searcy Street
Heber Springs, AR 72543

**RE: Soil/Groundwater Contamination Downers Grove Illinois
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Thomas J. Sisul

Registered Agent for Contemporary Control Systems, Inc.

5120 Main St Suite 3

Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove Illinois
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Illinois Corporation Service
Registered Agent for CVP Systems, Inc.
801 Adlai Stevenson Drive
Springfield, IL 62703-4261

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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CT Corporation System
Registered Agent for Diamond Power Specialty, Inc.,
208 S. LaSalle St, Suite 814
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for Dicke Tool-
314 E Thayer Ave; PO Box 400
Bismarck, ND 58502-0400

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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Michael A. Spada
Registered Agent for Downers Grove Radiator
1513 Ogden Ave
Downers Grove, IL 60515-2737

**RE: Soil/Groundwater Contamination Downers Grove Illinois
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CHICAGO, ILLINOIS 60610

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(312) 836-9083

JOSEPH V. KARAGANIS
A. BRUCE WHITE
BARBARA ANNE MAGEL
MARK D. ERZEN
JOHN W. KALICH
CHRISTOPHER W. NEWCOMB

Direct Dial: 312/836-1177, ext. 124
email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Chester J. Winter Jr
Registered Agent for Downers Grove Reporter
922 Warren Ave
Downers Grove, IL 60515-3600

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

Comprehensive Environmental Response, Compensation, and Liability Act

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Precision Brand intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET - SUITE 810

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Registered Agent for Downers Grove Sanitary District
2710 Curtiss Street
Downers Grove, Illinois 60515

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Robert A. Schuman
Registered Agent for DynaGear, Inc.
222 S. Riverside Plaza #850
Chicago, IL 60606-5901

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

James C. Klouda
Registered Agent for Elite Electronic Engineering Co.
1516 Centre Circle
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Salvatore R. Sprovieri
Registered Agent for Flavorchem
1525 Brook Drive
Downers Grove, IL 60515-1024

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Leroy W. Meyer
Registered Agent for Flexible Steel Lacing Co.
2525 Wisconsin Ave
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Richard H. Krause
Registered Agent for Fusibond, Inc.
2615 W Curtiss
Downers Grove, IL 60515-4003

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

General Battery Corporation
Registered Agent for General Battery
1111 W. Long Lake, Suite. 300
Troy, MI 48098

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir or Madam:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Cheryl Luque
Registered Agent for Graphics Plus
2608 Rothland
Plano, TX 75023

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C. Andrew Miriani

Registered Agent for Grayhill Moldtronics, Inc.

40 Shuman Blvd Suite 150

Naperville, IL 60563

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Jack W. Grove
Registered Agent for Grove Printing, Inc.
400 South 6th Street
Waco, TX 98101

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for Hollister-Stier Laboratories, Inc.
520 Pike St
Seattle, WA 98101-1385

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for International Piping Services Co.
208 South LaSalle St, Suite 814
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William G. Wolfe

Registered Agent for J.L. Clark Mg. Co. (Div. of Atlas Tubing)

4525 Gollihar St Suite 114

Corpus Christi, TX 78411-2931

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Curtis Edwin Johnson
Registered Agent for Johnson Printers
750 W. New Haven Ave.
Melbourne, FL 32901

**RE: Soil/Groundwater Contamination Downers Grove Illinois
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KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET - SUITE 810

CHICAGO, ILLINOIS 60610

TELEPHONE

(312) 836-1177

TELEFAX

(312) 836-9083

JOSEPH V. KARAGANIS

A. BRUCE WHITE

BARBARA ANNE MAGEL

MARK D. ERZEN

JOHN W. KALICH

CHRISTOPHER W. NEWCOMB

Direct Dial: 312/836-1177, ext. 124

email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Cathy G. Collins

Registered Agent for Lindy Manufacturing Company

6S167 Canterbury Ct

Naperville, IL 60540

**RE: Soil/Groundwater Contamination Downers Grove Illinois
 Notice of Suit CERCLA, RCRA, State Laws**

Dear Madam:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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CHRISTOPHER W. NEWCOMB

Direct Dial: 312/836-1177, ext. 124
email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Randy Stodola
Registered Agent for Lockformer Company / Met-Coil Systems Corporation
711 Ogden Avenue
Lisle, IL 60532

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Thomas R. Brininger
Registered Agent for Lovejoy, Inc.
2655 Wisconsin Ave
Downers Grove, IL 60515-4229

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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Direct Dial: 312/836-1177, ext. 124
email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Judy G. Stevenson
Registered Agent for Magnetrol International Inc.
5300 Belmont Rd
Downers Grove, IL 60515-4400

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Madam:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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CHRISTOPHER W. NEWCOMB

Direct Dial: 312/836-1177, ext. 124

email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William A. Benson

Registered Agent for Maple Grove Automotive, Ltd.

2315 Maple Ave

Downers Grove, IL 60515-4225

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C. Andrew Miriani
Registered Agent for Moldtronics, Inc.
40 Shuman Blvd Suite 150
Naperville, IL 60563

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Registered Agent for Molex, Inc.
2222 Wellington Court
Lisle, IL 60532

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir or Madam:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Richard R. Morey
Registered Agent for Morey Corporation
100 Morey Dr
Woodridge, IL 60517

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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CHRISTOPHER W. NEWCOMB

Direct Dial: 312/836-1177, ext. 124

email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Jack Campbell

Registered Agent for Norwood Marking Systems

2538 Wisconsin Ave

Downers Grove, IL 60515-4230

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for Packard Instrument Co.
1 Commercial Plaza
Hartford, CT 06103

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir or Madam:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Norman S. Lynn
Registered Agent for Principal Mfr. Co.
660 LaSalle Pl Suite 3A
Highland Park, IL 60035

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for Rexnord Industries, Inc.
208 South LaSalle St, Suite 814
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Donald E. Miller, Senior Vice President and General Counsel
Registered Agent for RHI Holdings, Inc. / Fairchild Corporation
1750 Tyson's Boulevard, Suite 1400
McLean, Virginia 22102

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Seth M. Hemming
Registered Agent for Scot, Inc.
Sachnoff & Weaver
30 South Wacker Drive
29th Floor
Chicago, IL 60606

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

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CHICAGO, ILLINOIS 60610

TELEPHONE

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JOSEPH V. KARAGANIS

A. BRUCE WHITE

BARBARA ANNE MAGEL

MARK D. ERZEN

JOHN W. KALICH

CHRISTOPHER W. NEWCOMB

Direct Dial: 312/836-1177, ext. 124

email: Mark_Erzen@K-W.COM

June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for ServiceMaster, Inc.
1200 South Pine Island Road
Plantation, FL 33324

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir or Madam:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

Comprehensive Environmental Response, Compensation, and Liability Act

Please be advised that pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC §§9601 *et seq.*), Precision Brand intends to sue you as a potentially responsible party and/or for violations of CERCLA and applicable regulations. Specifically, the above entity or individual is or was the owner or operator of a facility in Ellsworth Industrial Park from which hazardous substances have been released to soils and/or groundwater. At some prior time or presently, the above entity or individual or a predecessor caused or allowed the release of hazardous substances into soils and groundwater at the facility, or otherwise falls within the provisions set forth at Section 107 of CERCLA (42 USC §9607). The contamination remains and continues to migrate onto the Precision Brand property and downgradient locations. Precision Brand intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

KARAGANIS, WHITE & MAGEL LTD.

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET - SUITE 810

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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Brian Spannagel
Registered Agent for Spannagel Tool & Die
336 E Walnut St
Roselle, IL 60172

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ralph W. Grandle
Registered Agent for Tricon Industries
1600 Eisenhower Lane #200
Lisle, IL 60532

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
Registered Agent for Vaughan Seed Co.
319 S Coteau
Pierre, SD 57501-3108

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir or Madam:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Richard A. Marvil
Registered Agent for White Lake Building Corporation
22W782 Sycamore Drive
Glen Ellyn, IL 60137

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Sir:

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June 24, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William Helwig
2301 N. Brighton Place
Arlington Heights, IL 60004

**RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws**

Dear Mr. Helwig:

This letter provides you with notice that Precision Brand Products, Inc. of Downers Grove, Illinois ("Precision Brand") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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Precision Brand intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

Registered Agent

June 24, 2004

Page -2-

Additionally, Precision Brand may bring an action against you for violation of Section 103(a) of CERCLA (42 USC §9603(a)). You were the person in charge of an onshore facility and have failed to notify the National Response Center of a release of a hazardous substance.

Precision Brand may bring actions under CERCLA in 60 days and will pursue all applicable remedies and relief available under CERCLA.

Resource Conservation and Recovery Act

Please be advised that pursuant to Section 7002 of the Resource Conservation and Recovery Act (RCRA) (42 USC §6972), Precision Brand intends to sue the above entity and/or individual for violations of RCRA and applicable regulations, and for contributing to conditions which may present an imminent and substantial endangerment to health or the environment. Specifically, the above entity and/or individual is or was the owner or operator of the property or otherwise contributed to the contamination. There may be other hazardous wastes, solid wastes or regulated substances which were also released at your property(ies) which present or may present an imminent and substantial threat to public health and the environment. Hazardous wastes and/or solid wastes and/or regulated substances have not been properly handled, stored, or disposed pursuant to the requirements of RCRA and regulations promulgated thereunder. The hazardous wastes and/or solid wastes and/or regulated substances remain and continues to migrate onto the Precision Brand property and downstream locations.

Precision Brand may an action pursuant to 42 USC §6972(a)(1)(A) in 60 days; and an action pursuant to 42 USC §6972(a)(1)(B) in 90 days.

State Claims

This notice also serves as your notice of Precision Brand's demand for removal and ejectment of the above entity's and/or individual's contaminants from Precision Brand's property.

The toxic and dangerous chemicals from the above entity's and/or individual's facility have migrated across property boundaries and are now located groundwater at Precision Brand's facility.

Precision Brand hereby demands that, within 10 days, you remove all solvents and other chemicals, compounds which migrated from the above entity's and/or individual's facility. Upon the expiration of this 10-day period, Precision Brand will pursue state claims, including but not limited to negligence, nuisance, trespass, continuing intentional trespass and violation of the Illinois Environmental Protection Act.

Registered Agent

June 24, 2004

Page -3-

Conclusion

The above claims may be combined with other federal or state statutory or regulatory actions, and with other common law actions. If we do not reach settlement with you before the notice periods of 60 and 90 days expire, Precision Brand will bring suit against you in federal court. We have been retained to represent Precision Brand in this matter. If you have any questions or would like to discuss this matter further, please contact me.

Very truly yours,



Mark D. Erzen

MDE/ms

cc: Hon. Michael Leavitt, Administrator, USEPA
Hon. Bharat Mathur, Acting Regional Administrator, USEPA
Hon. John Ashcroft, Attorney General, U.S. Department of Justice
Hon. Renee Cipriano, Director, IEPA
Hon. Lisa Madigan, Attorney General, State of Illinois
Hon. Rod Blagojevich Governor, State of Illinois
(all via certified mail)

Registered Agent

June 24, 2004

Page -4-

Mr. Michael Leavitt , Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W., 1101A
Washington, D.C. 20460

Mr. Bharat Mathur
Acting Regional Administrator
United States Environmental Protection Agency
77 West Jackson Boulevard R-19J
Chicago, IL 60604

Hon. John Ashcroft
Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Hon. Renee Cipriano, Director
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1021 North Grand Avenue East
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Springfield, IL 62794-9276

Hon. Lisa Madigan
Attorney General
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Governor of the State of Illinois
100 West Randolph Street
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